

**UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF MICHIGAN**

YAACOV APELBAUM, a New York resident,  
and XRVISION, LTD., a New York corporation,

Plaintiffs,

Case No. 2:23-cv-11718

v.

Hon. Stephen J. Murphy, III  
Hon. Anthony P. Patti

STEFANIE LAMBERT, a Michigan resident, and  
THE LAW OFFICE OF STEFANIE L. LAMBERT,  
PLLC, a Michigan professional limited liability company  
and BILL BACHENBERG, a Pennsylvania resident,

Defendants.

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**DECLARATION OF JOHN C. BURNS, ESQ.**

I, John C. Burns, attorney for Plaintiffs, swear under penalty of perjury that to best of my knowledge, ability and belief, the facts contained in Plaintiffs' Motion for Alternate Service (Dkt. #6) and in Plaintiffs' Memorandum in Response to the Court's Show Cause Order of October 31, 2023, are correct and accurate.

Dated: November 13, 2023

Respectfully submitted,

/s/ John C. Burns  
John C. Burns